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Attorneys for Plaintiff Mohan R. Sundaram

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MOHAN R. SUNDARAM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

FRESHWORKS INC., RATHNA GIRISH
MATHRUBOOTHAM, TYLER SLOAT,
ROXANNE S. AUSTIN, JOHANNA
FLOWER, SAMEER GANDHI, RANDY
GOTTFRIED, ZACHARY NELSON, BARRY
PADGETT, JENNIFER TAYLOR, MORGAN
STANLEY & CO. LLC, J.P. MORGAN
SECURITIES LLC, BOFA SECURITIES,
INC., JEFFERIES LLC, BARCLAYS
CAPITAL INC., ROBERT W. BAIRD & CO.
INCORPORATED, CANACCORD GENUITY
LLC, JMP SECURITIES LLC, NEEDHAM &
COMPANY, LLC, NOMURA SECURITIES
INTERNATIONAL, INC., OPPENHEIMER &
CO. INC., PIPER SANDLER & CO.,
RAYMOND JAMES & ASSOCIATES, INC.,
AMERIVET SECURITIES, INC.,
CASTLEOAK SECURITIES, L.P., SAMUEL
A. RAMIREZ & COMPANY, INC., and R.
SEELAUS & CO., LLC,

Defendants.

Case No. 3:22-cv-06750

**DECLARATION OF MANDEEP S.
MINHAS IN SUPPORT OF LEAD
PLAINTIFF'S SUR-REPLY**

Judge: Hon. Charles R. Breyer
Dept.: Courtroom 06, 17th Floor
Date: April 11, 2025
Time: 10:00 a.m.

1 I, Mandeep S. Minhas, pursuant to 28 U.S.C. §1746, declare as follows:

2 1. I am an attorney with the law firm of Scott+Scott Attorneys at Law LLP, Lead
3 Counsel for Lead Plaintiff and the proposed Class in this Action, and am admitted *pro hac vice* in
4 this matter. I have personal knowledge of the matters set forth herein, and if called upon I could
5 and would testify competently thereto.

6 2. Pursuant to the Court's Order Granting Lead Plaintiff's Administrative Motion for
7 Leave to File Sur-Reply Expert Report in Support of his Opposition to Freshworks' Motion for
8 Summary Judgment (ECF No. 130), attached as Exhibit A is a true and correct copy of the Expert
9 Sur-Reply Report, dated April 8, 2025.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12 Executed this 9th day of April 2025, in New York, New York.

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14 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

15 s/ Mandeep S. Minhas

16 MANDEEP S. MINHAS
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CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2025, I caused the foregoing document to be filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

Executed on April 9, 2025, at New York, New York.

s/ Mandeep S. Minhas

MANDEEP S. MINHAS